

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

x

T.K.

Plaintiff,

v.

**STIPULATION
EXTENDING TIME
TO RESPOND TO
COMPLAINT**

[REDACTED] Case No. 23cv5441(ARR)(LB)

Defendant.

x

IT IS HEREBY STIPULATED AND AGREED TO by and between counsel for the parties to the parties in this action:

- (1) That the time for the defendant [REDACTED] to respond to the complaint of plaintiff in this matter and to plaintiff's motion to proceed anonymously is hereby extended up to and including September 29, 2023;
- (2) In any response to the complaint, defendant [REDACTED] shall not assert a defense of lack of personal jurisdiction;
- (3) That this stipulation may be signed in counterpart;
- (4) That electronic and facsimile signatures shall qualify as signatures to the stipulation;
- (5) That the stipulation once executed may be filed in court without further notice.

Dated September 7, 2023

s/Daniel Szalkiewicz
DANIEL SZALKIEWICZ & ASSOCIATES
By: Daniel Szalkiewicz
Attorneys for Plaintiff
23 West 73rd Street
Suite 102
New York, NY 10023
(212)706-1007
daniel@lawdss.com

/s/ Oscar Michelen
CUOMO LLC
BY: Oscar Michelen
Attorneys for Defendant
200 Old Country Road
Suite 2 South
Mineola, NY 11501
(516)741-3222
omichelen@cuomollc.com

SO ORDERED: _____